

UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO

IN RE:

AUTOS VEGA, INC.

Debtor

CASE NO. 11-05773(MCF)

CHAPTER 11

MOTION TO REOPEN CASE

TO THE HONORABLE COURT:

COMES NOW, Autos Vega, Inc., a/k/a San Juan Lincoln, d/b/a Advertising Plus ("Autos Vega" or "Debtor"), as debtor and debtor-in-possession in the above captioned Chapter 11 bankruptcy case, through its undersigned counsel and hereby moves this Court, pursuant to 11 U.S.C. §§350 and 524, Fed.R.Bank.P 5010 and L.B.R. 5010-1 file this **Motion to Reopen Case**, and in support thereof respectfully shows the Court the following:

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 157 and 1334. Venue is appropriate before this Court pursuant to 28 U.S.C. §§1408 and 1409. The statutory predicates in support of the relief requested are 11 U.S.C. §§524 and 105 . This matter is a core proceeding pursuant to 28 U.S.C. § 157.

2. On July 6th, 2011, Debtor filed its petition for reorganization under the provisions of 11 U.S.C. Chapter 11 of the Bankruptcy Code. (Docket No. 1).

3. As of the filing of its Chapter 11 petition until the confirmation of its Plan of Reorganization (the "Plan") on May 30, 2012 (Dockets No. 237 and 238), Debtor managed its affairs and operated its business as a debtor-in-possession pursuant to 11 U.S.C. §§1107 and 1108.

4. On October 24, 2012, a Final Decree Order and Certificate of Consummation (Docket No. 257) was entered, discharging Autos Vega from all debts and claims against the bankruptcy estate except such debts as are by the Code exempted from operation of a discharge or as provided in the Confirmed Plan. Accordingly, the case was closed on or before October 24, 2012.

5. Included among the debts of Autos Vega at the time of the filing of the Chapter 11 bankruptcy petition was one owing to the Center for Collection of Municipal Income of Puerto Rico (CRIM for its Spanish acronym) for alleged unpaid taxes related to improvements of a property located in Cayey, Puerto Rico, Pin Number 324-046-319-21-003. This claim was properly listed in the schedules of debts filed by Autos Vega and released by the discharge granted herein.

6. Notwithstanding such fact, to this day, the CRIM in violation 11 U.S.C. §524 has not eliminated said claim from its records and thus, a Certificate of indebtedness issued by CRIM on November 26, 2013 indicates that this claim is still owed by Autos Vega. See Exhibit A herein.

7. Autos Vega pursuant 11 U.S.C. §350 desires to reopen this Chapter 11 case to request this Court to compel CRIM to issue a negative certificate of indebtedness in compliance with the discharge order.

8. Accordingly, Autos Vega prays that this case be reopened, and for such other and further relief as is just and proper.

WHEREFORE, it is respectfully requested that the above styled case be reopened without the payment of a filing fee and that it be referred to this Court for determination of an order concerning the discharged debt in question upon a motion to compel filed on this same date by Autos Vega, Inc.

NOTICE

NO HEARING WILL BE CONDUCTED HEREON UNLESS AN OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE APPEARING PARTIES (THROUGH THEIR RESPECTIVE UNDERSIGNED COUNSEL OF RECORD) WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTIONS. IF NO OBJECTION IS TIMELY SERVED AND FILED, THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. THE COURT RESERVES THE RIGHT TO SET AN EMERGENCY HEARING ON ANY MATTER DISCUSSED HEREIN.

CERTIFICATE OF SERVICE: We hereby certify that on this same date, the foregoing was

electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the Office of the United States Trustee, and all participants of CM/ECF system.

San Juan, Puerto Rico, this 26th day of November, 2013.

McCONNELL VALDES LLC
Attorneys for Autos Vega, Inc.
PO Box 364225
San Juan, Puerto Rico 00936-4225
Tel.:(787) 250-5681
Fax No.(787)759-2771

By: s/Antonio A. Arias-Larcada
Antonio A. Arias-Larcada
USDC-PR No.: 204906
aaa@mcvpr.com

By: s/Yarilyn C. Pérez-Colón
Yarilyn C. Pérez-Colón
USDC PR No. 224514
ycp@mcvpr.com



ESTADO LIBRE ASOCIADO

CENTRO DE RECAUDACION DE INGRESOS MUNICIPALES

ESTADO DE CUENTA /STATEMENT OF ACCOUNT

Fecha de Intereses/Descuento
Int/Disc Date:26/11/2013

Certificate # 7348074

Número de Catastro
(Pin Number)Número de Prestamo
(Loan Number)HIP
MTG IDMunicipio
(Municipality) 70

324-046-319-21-003

Cantidad
Adeudada
Amount Due

Tipo Notif/ Bill Type	Fecha Notif/ Bill Date	Principal Unpaid Tax	Descuento Discount	Penalidad Penalty	Intereses Interest	Recargos Surcharge	Cantidad Adeudada Amount Due
2014-I @	01/01/2014	1,622.97	-162.30	0.00	0.00	0.00	1,460.67
2014-I	01/07/2013	1,622.97	0.00	0.00	25.79	81.15	1,729.91
2013-I	01/01/2013	1,431.22	0.00	0.00	93.72	143.12	1,668.06
2013-I	01/07/2012	1,431.22	0.00	0.00	165.86	143.12	1,740.20
2008-I	01/01/2008	1,431.22	0.00	0.00	810.11	143.12	2,384.45
2008-I	01/07/2007	1,431.22	0.00	0.00	882.26	143.12	2,456.60
2007-I	01/01/2007	1,431.22	0.00	0.00	953.23	143.12	2,527.57
2007-I	01/07/2006	1,431.22	0.00	0.00	1,025.38	143.12	2,599.72
2006-I	01/01/2006	1,354.52	0.00	0.00	1,037.60	135.45	2,527.57
2006-I	01/07/2005	1,354.52	0.00	0.00	1,105.88	135.45	2,595.85
2005-I	01/01/2005	1,354.52	0.00	0.00	1,173.05	135.45	2,663.02
2005-I	01/07/2004	1,354.52	0.00	0.00	1,241.33	135.45	2,731.30
2004-I	01/01/2004	1,354.52	0.00	0.00	1,308.87	135.45	2,798.84
2004-I	01/07/2003	1,354.52	0.00	0.00	1,377.16	135.45	2,867.13
2003-I	01/01/2003	1,354.52	0.00	0.00	1,444.33	135.45	2,934.30
2003-I	01/07/2002	1,354.52	0.00	0.00	1,512.61	135.45	3,002.58
2002-I	01/01/2002	1,354.52	0.00	0.00	1,579.78	135.45	3,069.75
2002-I	01/07/2001	1,354.52	0.00	0.00	1,648.06	135.45	3,138.03
2001-I	01/01/2001	1,277.82	0.00	0.00	1,618.11	127.78	3,023.71
2001-I	01/07/2000	1,277.82	0.00	0.00	1,682.52	127.78	3,088.12
2000-I	01/01/2000	1,277.82	0.00	0.00	1,746.24	127.78	3,151.84
2000-I	01/07/1999	1,277.82	0.00	0.00	1,810.65	127.78	3,216.25
1999-I	01/01/1999	1,277.82	0.00	0.00	1,874.02	127.78	3,279.62
1999-I	01/07/1998	1,277.82	0.00	0.00	1,938.44	127.78	3,344.04
1998-I	01/01/1998	1,254.81	0.00	0.00	1,965.75	125.48	3,346.04
1998-I	01/07/1997	1,254.81	0.00	0.00	2,029.01	125.48	3,409.30
1997-I	01/01/1997	71.48	0.00	0.00	119.13	7.15	197.76
Grand Total		35,626.48	-162.30	0.00	32,168.89	3,319.16	70,952.23

Total Adeudado Al CRIM	70,952.23
---------------------------	-----------



ESTADO LIBRE ASOCIADO

CENTRO DE RECAUDACION DE INGRESOS MUNICIPALES

ESTADO DE CUENTA / STATEMENT OF ACCOUNT

Fecha de Intereses/Descuento
nt/Disc Date:26/11/2013

Certificate # 7348074

Número de Catastro (Pin Number)	Número de Prestamo (Loan Number)	HIP MTG ID	Municipio (Municipality)				
324-046-319-21-003			70				
Tipo Notif/ Bill Type	Fecha Notif/ Bill Date	Principal Unpaid Tax	Descuento Discount	Penalidad Penalty	Intereses Interest	Recargos Surcharge	Cantidad Adeudada Amount Due

Esta certificación no sera oficial sin el importe de \$2.50 en estampillas emitidas por el CRIM. Es valida para gestiones de cobro.

Esta Certification no incluye deudas por mejoras que estuvieran sin tasar.

La deuda marcada con @ no esta vencida.

Direccion Postal / Postal Address

AUTOS VEGA INC.

PO BOX 364252
SAN JUAN PR 00936-4252

Localización de la Propiedad / (Property Location)

SOLAR CARR 738
BO MONTELLANO
CAYEY PR